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 7
 8 IN THE UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

10
 11 UNITED STATES OF AMERICA,
 12 Plaintiff,
 13 v.
 14 APPROXIMATELY \$408,750.00 IN U.S.
 CURRENCY,
 15 Defendant.

2:19-MC-00050-KJM-AC

STIPULATION AND ORDER EXTENDING TIME
 FOR FILING A COMPLAINT FOR FORFEITURE
 AND/OR TO OBTAIN AN INDICTMENT
 ALLEGING FORFEITURE

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 17 It is hereby stipulated by and between the United States of America and potential claimant Li
 18 Qiu Lin (“Lin”), by and through their respective counsel, as follows:

19 1. On or about December 11, 2018, claimant Lin filed a claim in the administrative
 20 forfeiture proceedings with the Drug Enforcement Administration with respect to the Approximately
 21 \$408,750.00 in U.S. Currency (hereafter “defendant currency”), which was seized on October 15, 2018.

22 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
 23 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
 24 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person
 25 other than the claimant has filed a claim to the defendant currency as required by law in the
 26 administrative forfeiture proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
 28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
3 the parties. That deadline was March 11, 2019.

4 4. By Stipulation and Order filed March 6, 2019, the parties stipulated to extend to May 10,
5 2019, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 forfeiture.

8 5. By Stipulation and Order filed May 17, 2019, the parties stipulated to extend to July 9,
9 2019, the time in which the United States is required to file a civil complaint for forfeiture against the
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
11 forfeiture.

12 6. By Stipulation and Order filed July 3, 2019, the parties stipulated to extend to September
13 9, 2019, the time in which the United States is required to file a civil complaint for forfeiture against
14 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
15 forfeiture.

16 7. By Stipulation and Order filed September 10, 2019, the parties stipulated to extend to
17 November 8, 2019, the time in which the United States is required to file a civil complaint for forfeiture
18 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
19 subject to forfeiture.

20 8. By Stipulation and Order filed November 6, 2019, the parties stipulated to extend to
21 January 7, 2020, the time in which the United States is required to file a civil complaint for forfeiture
22 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
23 subject to forfeiture.

24 9. By Stipulation and Order filed January 9, 2020, the parties stipulated to extend to March
25 7, 2020, the time in which the United States is required to file a civil complaint for forfeiture against
26 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
27 forfeiture.

28 10. By Stipulation and Order filed March 10, 2020, the parties stipulated to extend to May 7,

1 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
2 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
3 forfeiture.

4 11. By Stipulation and Order filed May 12, 2020, the parties stipulated to extend to July 6,
5 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 forfeiture.

8 12. By Stipulation and Order filed July 20, 2020, the parties stipulated to extend to
9 September 4, 2020, the time in which the United States is required to file a civil complaint for forfeiture
10 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
11 subject to forfeiture.

12 13. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
13 extend to November 3, 2020, the time in which the United States is required to file a civil complaint for
14 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
15 currency is subject to forfeiture.

16 14. Accordingly, the parties agree that the deadline by which the United States shall be
17 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
18 alleging that the defendant currency is subject to forfeiture shall be extended to November 3, 2020.

19 Dated: 9/1/2020

MCGREGOR W. SCOTT
United States Attorney

21 /s/ Kevin C. Khasigian
22 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

24 Dated: 9/1/2020

25 /s/ Isaac Safier
ISAAC SAFIER
Attorney for Li Qui Lin
26 (As authorized via email)

1 IT IS SO ORDERED.

2 Dated: September 4, 2020.

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5 CHIEF UNITED STATES DISTRICT JUDGE
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